COMMENTS OPPOSING IMPLEMENTATION OF BPL

The Radio Club of Tacoma, representing 350 Amateur Radio operators in the Tacoma/Pierce County area of Washington State, **strongly** opposes the implementation of Broadband over Power Line (BPL) for the following reasons:

- 1. The high frequency (HF) radio spectrum is a valuable resource for international broadcasting, military applications, long distance maritime and aircraft communications and navigation, astronomy, and the amateur radio service.
- 2. Actual testing of BPL systems in Europe and Asia have proven that emissions from BPL have exceeded the conventional limits of interference and raised the ambient noise floor of receiving equipment.
- 3. Amateur radio operators utilize very sensitive receiving equipment that can be greatly degraded by local radio frequency noise sources, such as BPL emissions.
- 4. Current BPL technology provides the potential for interference **to** BPL customers by nearby transmitters. FCC regulations permit amateur radio operators to emit up to 1500 watts output on most of the allocated HF frequency bands. Amateur antennas located close to power lines may cause interference to BPL communications.
- 5. Testing of BPL systems in Europe showed that, under some conditions of ionospheric propagation, sky wave signals from BPL emissions were detected thousands of miles away.
- 6. BPL emissions will cause a harmful effect to radio systems over the entire radio spectrum, and many European countries and Japan have decided not to implement BPL for that reason.

Therefore, the above points considered, we oppose the implementation of BPL until actual testing of this technology has been performed, the results made public, and the potential for interference to HF radio reception has been satisfactorily addressed.

Sincerely, The Radio Club of Tacoma (Washington) By: Jerry Seligman, W7BUN Legal and Regulatory Committee July 7, 2003